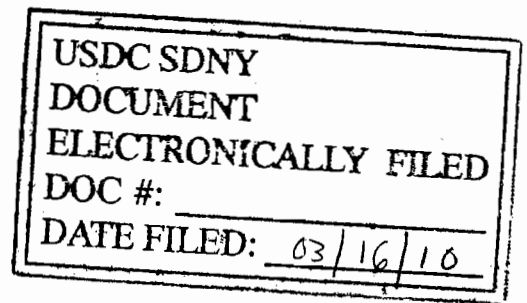


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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IN RE J. EZRA MERKIN AND BDO SEIDMAN : 08 Civ. 10922 (DAB)
SECURITIES LITIGATION

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STIPULATION AND ORDER

WHEREAS, in a January 28, 2010 Order, the Court ordered Plaintiffs to file a Consolidated Amended Complaint on March 1, 2010 and Defendants to move or answer by March 31, 2010; and



WHEREAS, Defendants seek an extension from March 31, 2010 until April 14, 2010 to answer, move, or otherwise respond to the SAC, this is the first request for an extension of this deadline, and Plaintiffs do not oppose this request; and

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by and among the undersigned counsel to the parties in the above-captioned action, that the time within which Defendants are required to answer, move, or otherwise respond to the Complaint filed by Plaintiffs shall be extended from March 31, 2010 to April 14, 2010;

It is further stipulated and agreed that this stipulation shall not be deemed to be an appearance in this litigation or consent by any Defendant to jurisdiction, and shall not constitute a waiver of any defenses or objections to this lawsuit or to the jurisdiction or venue of the Court.

DATED: March __, 2010

ABBEY SPANIER RODD & ABRAMS, LLP


By: Arthur N. Abbey  
Arthur N. Abbey
aabbey@abbeyspanier.com
Karin Fisch
kfish@abbeyspanier.com
Stephanie Amin-Giwner
samin@abbeyspanier.com
Richard B. Margolies
rmargolies@abbeyspanier.com

212 East 39th Street
New York, NY 10016
Telephone: (212) 889-3700
Fax: (212) 684-5191

Lead Counsel for the Class

DATED: March __, 2010

DECHERT LLP

By: Andrew J. Levander 

Andrew J. Levander

andrew.levander@dechert.com

Gary J. Mennitt

gary.mennitt@dechert.com

Neil A. Steiner

neil.steiner@dechert.com

Katherine Stroker

katherine.stroker@dechert.com

1095 Avenue of the Americas

New York, NY 10036


Telephone: (212) 698-3500

Fax: (212) 698-3599

*Attorneys for Defendants J. Ezra Merkin and
Gabriel Capital Corporation*

DATED: March __, 2010

EDWARDS ANGELL PALMER & DODGE, LLP

By: Ira G. Greenberg 

Ira G. Greenberg

igreenberg@eapdlaw.com

Robert Novack

rnovack@eapdlaw.com

Charles W. Stotter

cstotter@eapdlaw.com

750 Lexington Avenue

New York, NY 10022

Telephone: (212) 308-4411

Fax: (212) 308-4844

Attorneys for Defendants BDO Seidman, LLP

DATED: March 11, 2010

ALLEN & OVERY LLP

By: 

David C. Esseks

david.esseks@allenoverly.com

Julie Withers

julie.withers@allenoverly.com

Rasika Rathi

rasika.rathi@allenoverly.com

1221 Avenue of the Americas

New York, NY 10020

Telephone: (212) 610-6300

Fax: (212) 610-6399

*Attorneys for Defendants Fortis Bank S.A./N.V. and
Fortis Prime Fund Solutions (USA) LLC*

SO ORDERED

Dated: New York, New York
March 10, 2010



Deborah A. Batts

United States District Judge